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Attorneys for Plaintiff
V5 Technologies, LLC, d/b/a Cobalt Data Centers

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

V5 TECHNOLOGIES, LLC, d/b/a COBALT
DATA CENTERS,

Plaintiff,

v.

SWITCH, LTD., a Nevada limited company;
SWITCH BUSINESS SOLUTIONS, LLC, a
Nevada limited liability company; SWITCH
COMMUNICATIONS GROUP L.L.C., a
Nevada limited liability company; SWITCH,
INC., a Nevada corporation,

Defendants.

Case No. 2:17-CV-02349

STIPULATION AND
~~PROPOSED~~ ORDER TO
EXTEND DEADLINES

(First Request)

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-2, Plaintiff, V5 Technologies, LLC, d/b/a Cobalt Data Centers (“Plaintiff”), and Defendants, Switch Ltd., Switch Business Solutions, LLC, Switch Communications Group, L.L.C., and Switch Inc. (collectively, “Defendants”), hereby stipulate and agree to extend the time for Defendants to respond to Plaintiff’s Complaint and to extend the briefing schedule relating to the anticipated motion practice as set forth below. Additional time is warranted to permit Defendants ample time to research and analyze the issues raised in Plaintiff’s Complaint and for the parties to brief the complex issues raised by the claims set forth in that Complaint in the event any motion(s) are filed in response to Plaintiff’s Complaint. This is the first request for extension of time with respect to Defendants’ response to the Complaint and for the briefing schedule relating to such motion practice. Based on the foregoing, Plaintiff and Defendants stipulate and agree as follows:

1. That Defendants shall have an additional fourteen (14) days to respond to the Complaint, thereby giving Defendants a total of thirty-five (35) days to file their response, making the responsive pleading due on or before October 16, 2017;
2. That if Defendants respond to the Complaint by filing a Motion to Dismiss and/or another motion, Plaintiff shall have an additional fourteen (14) days to file its Response(s), thereby giving Plaintiff twenty-eight (28) days from the date of filing of Defendants’ motion(s) to file its Response(s);
3. That Defendants shall have an additional seven (7) days within which to file their Reply brief(s), thereby giving Defendants a total of fourteen (14) days from the date of filing of Plaintiff’s Response(s) to file their Repl(ies); and
4. That the Parties will schedule and conduct the discovery conference as required by Federal Rule of Civil Procedure 26(f) prior to the date on which Defendants must respond to the Complaint (October 16, 2017), provided that nothing herein shall be deemed a waiver of Defendants’ ability to file a Motion to Stay Discovery.

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Dated: October 4, 2017

Dated: October 4, 2017

By: /s/ Kerry E. Kleiman

By: /s/ Christopher Miltenberger

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED October 5, 2017.


Hon. Nancy J. Koppe
United States Magistrate Judge